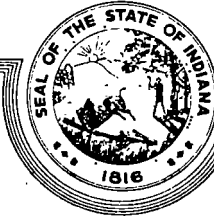




541018

STATE OF INDIANA



INDIANAPOLIS 46206

STREAM POLLUTION CONTROL BOARD

1330 West Michigan Street
633-5467

October 18, 1976

Mr. R. Dale Tull, Refinery Manager
Mobil Oil Corporation
East Chicago Refinery
East Chicago, Indiana 46312

Dear Mr. Tull:

Re: Industrial Waste Disposal

Several instances of improper disposal of waste liquids and other non-inert, (potentially) soluble materials have recently been brought to the attention of this office by representatives of the Solid Waste Management Section. These unapproved disposal techniques have taken many forms; however, the most frequently observed problem appears to be with the unauthorized disposal of waste materials at either properly licensed sanitary landfills or unlicensed fill sites. In an attempt to help you understand what constraints you must operate under in the disposal of certain waste materials, this letter is meant to serve as an explanatory tool.

As you are probably aware, Indiana Stream Pollution Control Board Regulation SPC 18, which became effective August 15, 1974, requires that no sanitary landfill may be operated without a valid operating permit issued by the Stream Pollution Control Board. In addition, the Regulation requires that hazardous wastes may not be disposed of at a sanitary landfill unless written authorization has been granted by the Board or its designated agent. For the purposes of this discussion, hazardous wastes can include oils, solvents, miscellaneous liquids and sludges, as well as such materials as toxic chemicals, pesticides, flammable items, and the like. What this means, then, is that the landfill disposal of each discrete hazardous waste material within the State of Indiana requires the prior approval of the Solid Waste Management Section.

To date, only a handful of waste materials generated in Lake County have been approved for landfill disposal. We recognize that many of these materials are disposed of out-of-state; however, it is also clear that large quantities are being disposed of illegally in Indiana. For this reason, we are attempting to compile a list of waste materials disposed of by certain major industries in order to determine which wastes have, and which have not, been approved for landfill disposal in this State. We are requesting that you submit a list of liquid, semi-liquid, non-inert solid and hazardous waste materials that are generated at

Mr. R. Dale Tull, Refinery Manager

October 18, 1976

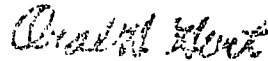
the plant to Mr. Jim Hunt, of the Water Pollution Control Division, Indiana State Board of Health, 1330 West Michigan Street, Indianapolis, Indiana 46206. The list should include the following information:

1. A description of each specific waste generated (regardless of current disposal method).
2. A description of the in-plant operation from which the waste is generated (unless that is obvious from the waste description).
3. Approximate quantity disposed of per unit time.
4. A notation designating whether the waste is disposed of at a site owned by you, or at an off-site location.

Forty-five days appears to be ample time in which to prepare this list, and as a result, we are requesting that you make your submittal before December 8, 1976. We expect that some form of follow-up from this office will be necessary following a review of the submitted information. We would, at the same time, expect that if the Company uncovers certain wastes which are being disposed of improperly, the appropriate steps will be taken to achieve compliance with Regulation SPC 18.

If you have any questions relating to any of the items discussed in this letter, or, if you need any guidance in obtaining the necessary approvals, please contact Mr. Jim M. Hunt of the Water Pollution Control Division at 317/633-3278.

Very truly yours,



Oral H. Hert
Technical Secretary

JMHunt/mdd

Enclosure: Indiana Regulation SPC 18

cc: Lake County Health Department